



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

409 3rd Street, SW, Suite 300
Washington, DC 20024

WARNING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

November 27, 2007

Mr. Reed Robinson
Vice President, Field Services
Columbia Gas Transmission
P.O. Box 1273
1700 MacCorckle Avenue, SE
Charleston, WV 25325-1273

CPF 1-2007-1015W

Dear Mr. Robinson:

On November 8, 2007, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your underground damage prevention notifications related to your right-of-way clearing work for the construction of the Columbia Gas Transmission (CGT) WB-2 VA Loop project along portions of Thoroughfare Rd in Rockingham County, Virginia. This inspection was related to a damage investigation initiated by PHMSA as a result of a reported hit on a Columbia Gas of Virginia distribution pipeline during the CGT right-of-way stump removal clearing for the CGT loop project.

As a result of the review of this matter and the site inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

1. **§192.614 (c)(5) Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins.**

Columbia Gas Transmission Corporation (CGT) did not provide for adequate temporary marking of buried pipelines in the area of the right of way clearing work for the CGT WB-2 VA Loop project, resulting in CGT third party damage to a Columbia Gas of Virginia gas distribution line.

During the course of the November 8, 2007 PHMSA field site visit of the WB-2 VA Loop project construction work, the Columbia Gas of Virginia incident site was visited.

A CGT contractor hit the Columbia Gas of Virginia distribution line on September 5, 2007 while performing stump removal work for CGT. An October 16, 2007 written response to PHMSA from CGT confirmed that the incident did take place.

Documents requested from CGT and received by PHMSA were one-call tickets from September 5-7, 2007 related to the stump removal work done near the incident site. PHMSA was given the one-call tickets up to and beyond the area of the incident location.

According to CGT contractor's representative contacted by PHMSA, the one-call ticket for their clearing work was not called in until September 4, 2007, the day after Labor Day and the day the stump removal work began. The damage was due to the CGT contractor's lack of not coordinating its work properly because of the Labor Day holiday, and mistakenly believing that a nearby Meter and Regulator (M & R) station owned and operated by the Columbia Gas of Virginia did not have a distribution pipeline that crossed the intended area of the right-of-way clearing work.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violation persists up to a maximum of \$1,000,000 for any related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item identified in this letter. Failure to do so will result in Columbia Gas Transmission being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 1-2007-1015W**. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b).

Sincerely,

For 

Byron E. Coy, Jr.

Director, Eastern Region

Pipeline and Hazardous Materials Safety Administration